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November 30, 2021 **SO ORDERED:**

**Via ECF**

Hon. George B. Daniels, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Peak Street  
New York, NY 10007

*George B. Daniels*  
George B. Daniels, U.S.D.J.

Dated: **DEC 01 2021**

Re: Alvarez v. AAZAM Food Corp. et al  
Case No.: 15-cv-03570-GBD

Your Honor,

This office represents the Plaintiff in the above referenced action brought under the Fair Labor Standards Act and New York Labor Law. We write to request a short two-week extension of time to file our opposition to Defendants' motion to vacate the default judgment levied against them on October 22, 2015. Specifically, Plaintiff is requesting an extension from December 2, 2021 to December 16, 2021. No previous request for an extension of this deadline have been made.

Prior to making this application the undersigned reached out to Defendants' counsel, via email, to request their consent. Defendants stated that they would not consent to the Plaintiff's request unless Plaintiff agreed to certain terms concerning the Plaintiff's restraining notices on the Defendants' bank account and bank boxes. Plaintiff rejected the Defendants' terms as unreasonable and improper considering the short extension request.

Given the above, we request the Court extend the Plaintiff's time to oppose the Defendants motion to vacate the default judgment levied against them on October 22, 2015 from December 2, 2021 to December 16, 2021.

Respectfully Submitted,  
LAW OFFICE OF WILLIAM CAFARO

*Amit Kumar*

By: Amit Kumar, Esq.  
*Attorneys for Plaintiffs*